



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Thursday, March 30, 2006

MEMORANDUM

Subject: Acute Toxicity Review for EPA Reg. No.: 71654-9/ CDRW-D5
DP Barcode: D327343

To: Emily Mitchell, PM 32/ Delores Williams
Regulatory Management Branch
Antimicrobials Division (7510C)

From: Ian Blackwell, Biologist *Ian D. Blackwell*
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Through: Karen Hicks, Team Leader *Karen Hicks*
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Applicant: Knock-Out Technologies, Inc.

FORMULATION FROM LABEL:

Active Ingredient(s):
Sodium dichloro-s-triazinetrione
Other Ingredient(s):

	<u>% by wt.</u>
	15
	85
Total:	100%

1) BACKGROUND: E.I DuPont de Nemours and Company has submitted a request for the waiver of the acute inhalation toxicity study requirement of their product, CDRW-D5. This request is assigned MRID Number 467673-01. The registrant's rationale for this waiver are:

- a) The formulation as it is sold is not readily adaptable to size reduction.
- b) The formulations of CDRW-D1 and CDRW-D5 share the same active and inert ingredients, but in different proportions. An attrition of CDRW-1 showed that approx. 86% of the particles were above 101 microns.
- c) Following three successive millings of CDRW-D1 (a similar product) resulted in a median diameter of 4.62 microns, but with a bimodal distribution of the test material.
- d) None of the components are volatile.

2) RECOMMENDATIONS: PSB findings are:

- a) CTT/PSB does not allow a registrant to cite a waiver of one product to support another product. The information provided was on CDRW-D1. At this time, we need more information on the properties of CDRW-D5. CTT asks that the registrant provide the following:
 - i) At least, an attrition study of CDRW-D5.
 - ii) Also, a particle size analysis of CDRW-D5.

The acute toxicity profile for File Symbol 71654-9 is currently:

Study	MRID Number	Toxicity Category	Status
Acute Oral Toxicity	465369-01	III	Acceptable
Acute Dermal Toxicity	465369-02	IV	Acceptable
Acute Inhalation Toxicity	465369-03	?	Waiver Denied
Primary Eye Irritation	465369-04	I	Waived
Primary Skin Irritation	465369-05	II	Acceptable
Dermal Sensitization	465369-08	Sensitizer	Acceptable

3) LABELING:

- a) CTT/PSB cannot recommend precautionary labeling at this time.